Response to Comments
Draft NPDES Permit No. ID-002028-1
City of Ketchum, Idaho

Background:

On February 7, 2001, EPA issued a notice of proposed reissuance of a National Pollutant Discharge Elimination System (NPDES) permit for a wastewater treatment facility owned and maintained by the City of Ketchum, Idaho. The facility consists of screening and grit removal followed by biological treatment using extended aeration activated sludge process. Alum and polymers are added prior to secondary clarification for phosphorus removal. The effluent is then chlorinated followed by dechlorination using sulfur dioxide. Sludge from the facility is treated by aerobic digestion and is disposed of at a landfill site. The wastewater from the facility is discharged to the Big Wood River. The public review and comment period was from February 7, 2001 through March 9, 2001.

Written comments regarding the proposed permit for the Ketchum facility were received from the permittee, through a letter from David Swindle, Superintendent of the Ketchum Wastewater Department. The following summarizes and responds to each comment raised.

1. **Comment**: The permittee requested an increase in the method detection limits (MDL) for copper, lead, and mercury. The increased MDLs would conform to their laboratory's regular MDLs and could readily be performed. The permittee requested that MDL for copper increase from 5.0 µg/L to 10.0 µg/L; the MDL for lead increase from 1.0 µg/L to 5.0 µg/L; and the MDL for mercury increase from 0.005 µg/L to 0.2 µg/L.

   Response: EPA contacted Mr. Dave Bennett[1], who is employed at the laboratory used by the City of Ketchum, to discuss the MDLs required in the permit. During this conversation it was confirmed that MDL's for copper and lead could be achieved. However, the laboratory does not have the necessary equipment to meet the MDL for mercury. Typically, the lab has been achieving an MDL of 0.2 µg/L, however, using existing laboratory equipment Mr. Bennett believes the lab can reach an MDL of 0.002 µg/L within the next few months. Mr. Bennett also indicated that it would be helpful to incorporate an MDL range for mercury rather than a single number.

   Based on this conversation, the final permit contains an MDL of 5.0 µg/L for copper, 1.0 µg/L for lead, and a range of 0.01 µg/L - 0.005 µg/L for mercury. Achieving these MDLs will allow EPA to analyze the facility's effluent and ensure that the metals levels are low enough to ensure the protection of aquatic life.

[1] Personal communication, April 2, 2001.

2. **Comment**: The permittee requested that the monthly receiving water sampling be changed to quarterly sampling. Quarterly sampling is requested because access to the Big Wood River can be difficult, and sometimes dangerous, particularly in the winter when snow can be very deep, and in the spring if a large runoff occurs. Quarterly monitoring would allow the permittee the flexibility to work around these "natural" obstacles.

   Response: Due to the permittee's concerns the final permit has been revised to require quarterly monitoring for a period of four years.